

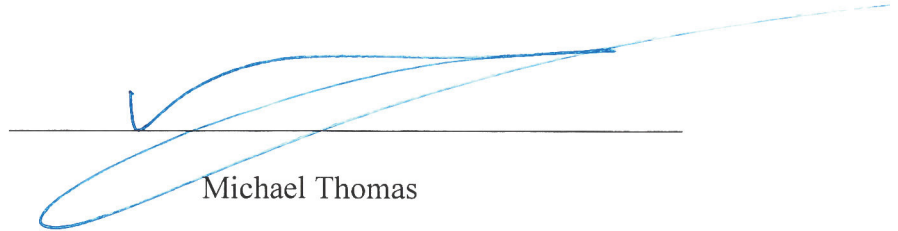
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

_____	X	
	:	
LAFARGE CANADA INC. and LAFARGE	:	
NORTH AMERICA INC.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	15-CV-8957 (RA)
	:	
AMERICAN HOME ASSURANCE COMPANY,	:	
AIG INSURANCE COMPANY OF CANADA,	:	
and LEXINGTON INSURANCE COMPANY,	:	
	:	
Defendants.	:	
	:	
_____	X	

**DECLARATION OF MICHAEL THOMAS**

1. I have been retained by Covington & Burling LLP to provide expert testimony in this case.
2. Attached as Exhibit 1 is a true and correct copy of the expert report that I prepared and signed in this matter on March 20, 2017
3. Exhibit 1 contains a true and correct statement of my background, opinions, and the bases for my opinions in this matter concerning progressive property damage caused by pyrrhotite oxidation and the delay of visible manifestation of such damage.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 7, 2017 in Roswell, GA.

A handwritten signature in blue ink, consisting of a large, sweeping loop followed by a horizontal stroke, is written over a solid black horizontal line.

Michael Thomas